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8 Attorney for Debtor.

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7 **IN THE UNITED STATES BANKRUPTCY COURT**  
8  
9 **FOR THE DISTRICT OF ARIZONA**

10 In Re:  
11 MICHAEL ALAN GIBBS,

12 Debtor.  
13

Chapter 13 Proceedings

Case No: 4:16-bk-08178- BMW

**MOTION TO EXTEND THE DEADLINE  
TO SUBMIT THE PROPOSED  
STIPULATED ORDER CONFIRMING  
FOURTH AMENDED CHAPTER 13  
PLAN TO THE TRUSTEE**

14 COMES NOW the Debtor by and through undersigned counsel and hereby request an  
15 extension to allow the filing of the proposed Stipulated Order Confirming Fourth Amended  
16 Chapter 13 Case.

17 1. The Debtor filed a Chapter 13 bankruptcy on July 18, 2016.

18 2. Debtor needs additional time to comply with trustee's requests and to resolve the  
19 objection of Grasky Endurance Coaching, LLC dba Tucson Endurance Performance Center.

20 3. Once the issue with the objection of Grasky Endurance Coaching, LLC dba Tucson  
21 Endurance Performance Center has been resolved, Debtor can submit the proposed Stipulated Order  
22 Confirming the Fourth Amended Chapter 13 Plan to the trustee.

23 4. As there issues remain outstanding, Debtor requests additional time to  
24 accommodate the time necessary to submit a proposed Stipulated Order Confirming the Fourth  
25 Amended Chapter 13 Plan.

26 WHEREFORE, the Debtor asks the Court to extend the deadline to submit the Proposed  
27 Stipulated Order Confirming the Fourth Amended Chapter 13 Plan to November 20, 2018.

28 Dated: September 24, 2018

Law Offices of Matthew Foley, PLC

By: /s/ MTF, (023212)

MATTHEW T. FOLEY, Esq. #023212  
Attorney for Debtor

1 I hereby certify that on September 24, 2018, I have served a copy of this Notice and all  
2 attachments to the following by electronic mail to:

3 Dianne C. Kerns, Ch. 13 Trustee. mail@dcktrustee.com  
4 Office of the U.S. Trustee, 230 N. USTPregion14.pxECF@USToj.gov

5 By: /s/ JDL  
6 Jennifer D. Linden, Paralegal

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